

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEOFFREY L. BURTCH, CHAPTER 7
TRUSTEE, FACTORY 2-U STORES,
INC., et al.,

Plaintiff,

v.

MILBERG FACTORS, INC.,
CAPITAL FACTORS, INC., THE CIT
GROUP/COMMERICAL SERVICES, INC.,
GMAC COMMERCIAL FINANCE LLC,
HSBC BUSINESS CREDIT (USA) INC.,
ROSENTHAL AND ROSENTHAL, INC.,
STERLING FACTORS CORPORATION,
WELL FARGO CENTURY, INC.,

Defendants.

Civil Action No. 1:07-cv-00556-***

MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission *pro hac vice* of Lloyd M. Green, Esquire to represent GMAC Commercial Finance LLC in the above captioned bankruptcy proceedings.

Respectfully submitted,

Dated: October 12, 2007
Wilmington, Delaware

EDWARDS ANGELL PALMER & DODGE LLP

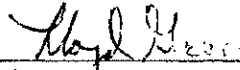


Stuart M. Brown (No. 4050)
Mark D. Oliver (No. 4291)
919 North Market Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 777-7770
Facsimile: (302) 777-7263
sbrown@capdlaw.com
molivere@capdlaw.com

Counsel for GMAC Commercial Finance LLC

CERTIFICATION OF COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Local Rule 83.5, I certify that I am eligible for admission *pro hac vice* to this Court. I am admitted to practice in good standing in the State of New York and the District of Columbia. Pursuant to Local Rule 83.6, I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of this action. I have access to, or have acquired a copy of the Local Rules of this Court and am generally familiar with such Rules. In accordance with Standing Order for District Court Fund effective 1/1/05, I further certify that the annual fee of \$25.00 will be submitted to the Clerk's Office upon the filing of this motion.



Lloyd M. Green, Esq.
Otterbourg, Steindler, Houston & Rosen, P.C.
230 Park Avenue, 29th Floor
New York, New York 10169
Telephone: (212) 661-9100
Telecopier: (212) 682-6104
lgreen@oshr.com

Counsel for GMAC Commercial Finance LLC

Dated: October 12, 2007

ORDER GRANTING MOTION

IT IS HEREBY ORDERED that counsel's motion for admission *pro hac vice* is granted.

United States District Judge

Dated: _____, 2007

CERTIFICATE OF SERVICE

I, Mark D. Olivere hereby certify that on the 2nd day of October, 2007, I caused two copies of the foregoing **MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*** to be served upon the parties listed below in the manner indicated:

VIA HAND DELIVERY

George R. Tsakataras, Esq.
Robert W. Pedigo, Esq.
Shelley A. Kinsella, Esq.
COOCH & TAYLOR
824 N. Market Street, Suite 1000
Wilmington, DE 19899

Joseph D. Mancano, Esq.
Anthony J. Basinski, Esq.
Bryan S. Neft, Esq.
Divya Wallace, Esq.
PIETRAGALLO BOSICK & GORDON LLP
1255 Drummers Lane, Suite 105
Wayne, PA 19087
*Attorneys for Plaintiff, Jeoffrey L. Burtch,
Chapter 7 Trustee*

/s/ Mark D. Olivere
Mark D. Olivere (No. 4291)